

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JANICE STEVENSON,)	
)	
)	
Plaintiff,)	
)	CIVIL ACTION NO. 05-CV-11584-DPW
v.)	
)	
NEIGHBORHOOD HOUSE CHARTER)	
SCHOOL,)	
)	
Defendant.)	
)	

**DEFENDANT’S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND FOR SANCTIONS**

Pursuant to Fed.R.Civ.P. 37, Defendant Neighborhood House Charter School (“Defendant”) moves this Court for an Order: (a) compelling Plaintiff Janice Stevenson (“Plaintiff”) to produce all documents responsive to Defendant’s First Set of Document Requests to Plaintiff; (b) precluding Plaintiff from submitting as evidence at any later stage of these proceedings any document responsive to Defendant’s First Set of Document Requests that she fails or refuses to produce within five (5) days of the Court’s Order on this motion; and (c) requiring Plaintiff to pay to Defendant the costs Defendant has incurred in bringing this motion, including its attorney’s fees. As set forth more fully in Defendant’s Memorandum in Support of Its Motion to Compel Production of Documents and for Sanctions, Plaintiff has attempted to shirk her discovery obligations in this matter by interposing inappropriate objections to

Defendant's proper requests and by failing and refusing to produce critically important documents without valid grounds or excuse.

Respectfully submitted,

NEIGHBORHOOD HOUSE CHARTER
SCHOOL,
By its attorneys,

/s/ Barry J. Miller

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DATED: August 7, 2006

Certificate of Compliance with Local Rules 7.1 and 37.1

I hereby certify that I attempted in good faith to resolve or narrow the issues presented by this motion by conferring with Plaintiff Janice Stevenson. On July 28, I sent a letter to Plaintiff by e-mail and by U.S. Mail regarding the subject matter of this motion. As of the date of this motion, Plaintiff has not responded to that correspondence. At Ms. Stevenson's request, the Court has imposed restrictions on Defendant's counsel's communications to her. Defendant's counsel has, therefore, refrained from contacting Ms. Stevenson in person or by telephone regarding this matter.

/s/ Barry J. Miller

Barry J. Miller

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the Court's ECF system and that a true copy of the above document was served on Plaintiff *pro se* Janice Stevenson by first class U.S. mail to P.O. Box 400372, Cambridge, MA 02140 on August 7, 2006.

/s/ Barry J. Miller

Barry J. Miller